

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CHRISTOPHER J. HOLMES,

Plaintiff,

v.

Civil Action No.: 3:18-cv-00057-MHL

JASON NORTON,

Defendant.

PLAINTIFF'S MOTION FOR EXTENSION OF TIME

NOW COMES the Plaintiff, by counsel, and moves the Court for an Order extending the time for the Plaintiff to file his Memorandum in Opposition to the Defendant's Rule 12(b)(6) Motion to Dismiss, and in support thereof says as follows:

1. In response to the Complaint filed and served in this action, the Defendant filed a Rule 12(b)(6) Motion to Dismiss, and accompanying Memorandum of Law in support thereof on February 21, 2018.

2. Pursuant to this Court's Local Rule 7(F), Plaintiff's responsive memorandum is due to be filed within 11 days, March 2, 2018.

3. A Settlement Conference is scheduled in this action for March 5, 2018, before the Honorable David J. Novak, Magistrate Judge, and the parties are working toward settlement.

4. The Plaintiff requests that this Court grant him an extension of eleven days after the settlement conference, March 16, 2018, to file his responsive memorandum in the event the case does not settle at the Settlement Conference.

5. Counsel for the Plaintiff has received confirmation from counsel for the Defendant that he has no objection to this extension.

WHEREFORE, the Plaintiff respectfully prays that this Court enter an Order granting an extension to file his responsive memorandum by March 16, 2018, for the reasons set forth herein.

Christopher J. Holmes
By counsel

/s/ David L. Epperly, Jr.
David L. Epperly, Jr., Esquire, VSB #30072
EPPERLY & FOLLIS, P.C.
7 East Franklin Street
Richmond, Virginia 23219
(804) 648-6480
(804) 643-1551 facsimile
depperly@lawyersva.com

Christopher M. Bradshaw, Esquire, VSB #74705
BRADSHAW & O'CONNOR, P.C.
7 East Franklin Street
Richmond, Virginia 23219
(804) 622-7701
(804) 643-1551 facsimile
cbradshaw@bradshawoconnor.com

Counsel for Plaintiff

Certificate of Service

I hereby certify that on this 28th day of February, 2018, a true and correct copy of the foregoing Notice of Appearance was sent by e-mail to:

David P. Corrigan, Esquire
Harman, Claytor, Corrigan & Wellman
4951 Lakebrook Drive, #100
Glen Allen, VA 23060
dcorrigan@hccw.com